B. CLYDE HUTCHINSON, 037526 1 AN H. NGUYEN, 215453 2 LOMBARDI, LOPER & CONANT, LLP Lake Merritt Plaza 3 1999 Harrison Street, Suite 2600 Oakland, CA 94612-3541 4 TEL: (510) 433-2600 FAX: (510) 433-2699 5 Attorneys for Defendant 6 NATIONAL RAILROAD PASSENGER CORPORATION 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA—SACRAMENTO DIVISION 10 LORIE ALMAZAN and ESTHER GALVEZ, No. CIV S-04-1872 MCE PAN 11 Plaintiffs, STIPULATION AND ORDER RE 12 CONTINUANCE OF DISCOVERY **CUT-OFF** v. 13 AZIZURANMAN RAHMANI, SAYED A. 14 KARIMI, individually and dba ORANGE CAB CO.; ORANGE CAB CO.; NATIONAL 15 RAILROAD PASSENGER CORPORATION and DOES 1 to 20, 16 Defendants. 17 18 19 20 21 22 23 24 25 26 27 28

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1	This lawsuit arises out of a motor vehicle collision on April 17, 2004 wherein plaintiffs		
2	allege that they were injured while riding in an Orange Cab Co. taxi, owned by SAYED A.		
3	KARIMI and operated by his agent, employee or contractor AZIZURANMAN RAHMANI.		
4	Plaintiffs filed suit against National Railroad Passenger Corporation (NRPC), SAYED A.		
5	KARIMI, Orange Cab Co., and AZIZURANMAN RAHMANI. Plaintiffs had made diligent		
6	efforts to serve all defendants but have been unable to locate SAYED A. KARIMI, Orange Cab		
7	Co., and AZIZURANMAN RAHMANI.		
8	The parties learned that Mr. Karimi had filed for bankruptcy protection. They have also		
9	been able to learn the identity of Mr. Karimi's insurance carriers. NRPC has been in touch with the		
10	insurance carrier who is represented by Dale Allen Jr. of Low, Ball & Lynch. NRPC is in		
11	discussion with Mr. Allen's client regarding the tender of its defense and indemnity of this matter.		
12	While the Court has granted the parties permission to serve additional parties, NPRC's tender and		
13	Mr. Karimi's bankruptcy status have delayed the litigation.		
14	The present discovery cut-off date is April 18, 2005. The parties hereby stipulate that the		
15	discovery cutoff be continued to July 15, 2005.		
16	The parties request that this stipulation be adopted as the order of the cour.t		
17	DATED: April 19, 2005	LOMBARDI LORER & CONANT LLD	
18	DATED: April 18, 2005	LOMBARDI, LOPER & CONANT, LLP	
19		By: /s/ An H. Nguyen	
20		An H. Nguyen Attorneys for Defendant NATIONAL RAILROAD PASSENGER	
21		CORPORATION	
22	///		
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1	DATED: April 18, 2005	FURTADO, JASPOVICE & SIMONS
2		
3		By: /s/ Martin L. Jaspovice Martin L. Jaspovice Attorneys for Plaintiffs
4		1 200 2 102 2 202 2000 2 202 20
5	<u>(</u>	<u>ORDER</u>
6	IT IS SO ORDERED.	
7	DATED: April 20, 2005	11 06
8		Munico 1.
9		MORRISON C. ENGLAND, JR UNITED STATES DISTRICT JUDGE
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